

JAP:AL

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

M11-149

- - - - - X

UNITED STATES OF AMERICA

- against -

C O M P L A I N T

MUHAMMAD QUASIM CHAUDHRY,

(18 U.S.C. § 1546)

Defendant.

- - - - - X

EASTERN DISTRICT OF NEW YORK, SS:

CHARLES HARRISON, being duly sworn, deposes and says that he is a Special Agent with the Department of State, Diplomatic Security Service ("DSS"), duly appointed according to law and acting as such.

On or about February 10, 2011, within the Eastern District of New York, the defendant MUHAMMAD QUASIM CHAUDHRY did knowingly and willfully use and attempt to use a United States visa that was procured by means of a false claim or statement and otherwise procured by fraud and unlawfully obtained.

(Title 18, United States Code, Section 1546).

The source of your deponent's information and the grounds for his belief are as follows:^{1/}

¹ Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause, I have not described all the relevant facts and circumstances of which I am aware.

1. I am a Special Agent with DSS and have been so since May 2009. I am familiar with the facts and circumstances set forth below from my personal involvement in the investigation, my review of the investigative file and from reports of other law enforcement officers involved in the investigation.

2. On or about February 10, 2011, the defendant arrived at John F. Kennedy International Airport ("JFK") on Saudi Arabian Airlines flight number 21, originating from Jeddah, Saudi Arabia. Upon arrival, the defendant presented to an officer of U.S. Customs and Border Protection ("CBP") a Pakistani passport bearing passport number CC4194471 and a B1/B2 United States visa bearing foil number C4669640. CBP officers then referred the defendant for secondary inspection.

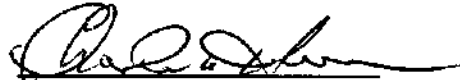
3. In secondary inspection, the defendant stated that he worked for a construction company in Pakistan called H.M. Sons & Co., and that he was traveling to the United States in order to attend a business meeting with Amir Sharif. The defendant stated that Amir Sharif is his brother. The defendant also presented a letter from Amir Sharif purporting to invite the defendant to such a meeting. The letter purported to be on the letterhead of a company called Feelings International located at 20A 91st Street, Brooklyn, New York, which imported socks and T-shirts.

4. A CBP officer determined that 20A 91st Street, Brooklyn, New York is a residential address. The defendant was asked why an employee of a construction company had to meet with an importer of socks and T-shirts. The defendant could not provide an explanation. The defendant was asked why his brother needed to invite him to the United States via a formal letter. The defendant could not provide an explanation.

5. A query of the Consular Consolidated Database revealed that the defendant had obtained his visa from the United States Embassy in Islamabad, Pakistan on April 16, 2010. In his visa application, the defendant claimed that he was a director of H.M. Sons & Co., a government contractor that built road and irrigation systems, and that his purpose in traveling to the United States in May 2010 was to attend a family wedding.

6. The defendant was asked what the true purpose of his trips to the United States was. The defendant stated that he owns a fruit and vegetable warehouse in Pakistan and that from May 2010 through October 2010, he had worked with his brother in a grocery store in the United States. When asked about the family wedding he referred to in his visa application, the defendant was not able to provide basic information, such as who got married and where and when the wedding took place.

WHEREFORE, your deponent respectfully requests that the defendant MUHAMMAD QUASIM CHAUDHRY be dealt with according to law.



CHARLES HARRISON
Special Agent
Department of State

Sworn to before me this
11th day of February, 2011

THE HONORABLE JAMES ORENSTEIN
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK